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August 8, 1995

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

VIA FEDEX

Attn: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

Re: MM Docket No. 95-74 RM-8579; Proposed Allotment of Channel
254A to Benavides, Texas

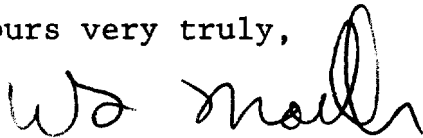
Dear FCC:

Enclosed herewith please find original and four copies of the Supplement to Comments and Counterproposal of Cosmopolitan Enterprises of Victoria, Inc. with regard to the above captioned matter, and in particular, the proposed Allotment of Channel 254A to Benavides, Texas.

By copy of this letter, we are sending copies of such Supplement to Comments and Counterproposal to those named below.

Thank you for your attention hereto.

Yours very truly,



William F. Moeller

WFM:cls
Enclosures

cc: James A. Koerner, Esq.
Baraff, Koerner, Olender
& Hochberg, P.C.
Suite 640
3 Bethesda Metro Center
Washington, D.C. 20816

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Federal Communications Commission
August 8, 1995
Page 2

cc: Barry D. Wood, Esq.
Jones, Waldo, Holbrook
& McDonough, P.C.
Suite 900
2300 M Street, N.W.
Washington, D.C. 20037

cc: Lee J. Peltzman, Esquire
2000 L Street, Suite 200
Washington, DC 20036

cc: Miguel A. Villarreal, Jr.
Radio Impacto KDOS/KZTQ
505 Houston Street
P. O. Box 814
Laredo, TX 78040

cc: Pamela Blumenthal
Federal Communications Commission
2025 M Street, N.W. - Room 8308
Washington, D.C. 20554

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Petition filed by Benavides) MM Docket No. 95-74
Communications, permittee of) RM-8579
Station KXTM(FM), Channel 299C2,)
Benavides, Texas, and the)
proposed allotment of Channel)
254A to Benavides, Texas)

TO: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

SUPPLEMENT TO COMMENTS AND COUNTERPROPOSAL

Cosmopolitan Enterprises of Victoria, Inc. ("Cosmopolitan"), licensee of Radio Station KTXN (FM), Victoria, Texas, hereby submits its Supplement to Comments and Counterproposal previously made by it in response to the Notice of Proposed Rule Making in the above captioned proceeding; such previous Comments and Counterproposal was sent via Federal Express Mail from Victoria, Texas, on July 21, 1995 to the Federal Communications Commission ("Commission").

Subsequent to Cosmopolitan's submission of Comments and Counterproposal, Cosmopolitan discovered the Notice of Proposed Rule Making In the Matter of:

MM Docket No. 95-120
In the Matter of
Amendment of Section 73.202(h),
Table of Allotments,
FM Broadcast Stations,
(Premont, Texas)

RM-8650

In such proceeding Paulina Bernal ("Petitioner"), licensee of Station KMFM(FM), Premont, Texas, sought the substitution of Channel 264C3 for channel 285A at Premont, Texas.

Cosmopolitan's original Comments and Counterproposal sought a substitution of Channel 265A instead of 254A at Benavides, Texas; Cosmopolitan does not withdraw its position but would further advise the Commission that there are other channels available which would allow Cosmopolitan to upgrade to Channel 254C, utilizing its existing transmitter site, and it would be able to increase its coverage by approximately 35%, without any adverse public interest consequences; Cosmopolitan advises the Commission that the following Channels would be available and acceptable for its counterproposal with regard to Benavides, Texas:

<u>Frequency</u>	<u>Channel</u>
94.3	232A
93.5	228A
104.3	282A
102.5	273A

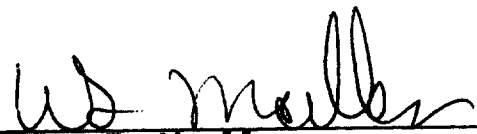
It is respectfully submitted that the substitution of Channel 265A or one of the above mentioned Channels 232A, 228A, 282A and 273A instead of 254A at Benavides, Texas would be in the public interest and would be in the interest of both Cosmopolitan and the Benavides station, permitting their future upgrades.

Respectfully submitted,

COSMOPOLITAN ENTERPRISES OF
VICTORIA, INC.
P. O. Box 2682
Victoria, Texas 77902

By 
John J. Tibbitt
President

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(512) 573-4315

By 
William F. Moeller
State Bar No. 14248000

ATTORNEYS FOR COSMOPOLITAN ENTERPRISES
OF VICTORIA, INC.

CERTIFICATE OF SERVICE

I, William F. Moeller, attorney for Cosmopolitan Enterprises of Victoria, Inc., do hereby certify that copies of the foregoing document were sent, via First Class Mail, this 8th day of August, 1995, to the office of the following:


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& Hochberg, P.C.
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